

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	x	
SAFAVIEH INTL, LLC,	:	
	:	Case No. 1:24-cv-02456-
Plaintiff,	:	MKV-GS
	:	
-- against --	:	<b>PROPOSED ORDER TO</b>
	:	<b>SHOW CAUSE FOR</b>
CHENGDU JUNSEN FENGRUI TECHNOLOGY CO,	:	<b>PLAINTIFF’S MOTION</b>
LTD.-TAO SHEN and DOES 1-10,	:	<b>FOR ALTERNATIVE</b>
	:	<b>SERVICE</b>
Defendants.	:	
	:	
-----	x	

Pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 1201(a)(1)(A), N.Y. CPLR § 302, and Fed. R. Civ. Pro. 4(k), Plaintiff Safavieh Intl LLC (“Safavieh” or “Plaintiff”), by its attorneys Kaufman & Kahn, LLP, have moved the Court ex parte for an Order Authorizing Alternate Service. Plaintiff proceeds on the basis that Defendants, through Amazon.com, are engaging in the unauthorized sale and distribution of Plaintiff’s rug designs, which are the subjects of U.S. copyright registrations. Plaintiff seeks preliminary and permanent injunctive relief, compensatory, statutory, and punitive damages, and recovery of their reasonable costs and attorneys’ fees. Details are set forth in the Complaint.

Upon the Court having reviewed the Complaint, and in support of Plaintiffs’ motion the Memorandum of Law, the Declaration of Mark S. Kaufman dated May 8, 2024 and the Declaration of Bjorn Tuazon dated May 2, 2024, it is:

ORDERED, that Plaintiff may serve copies of this Order, the Complaint, Summons, and Plaintiff’s ex parte application (together with all supporting declarations and other documents) on the Defendants through the email address [junsen336@163.com](mailto:junsen336@163.com) and to any other email address

associated with Defendants' business that becomes known to Plaintiffs. Plaintiffs shall promptly file proof of such service.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2024

---

Hon. Judge Gary Stein, United States Magistrate  
Judge for the Southern District of New York